

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

BRIAN HUDDLESTON,

Plaintiff,

vs.

**FEDERAL BUREAU OF
INVESTIGATION and UNITED STATES
DEPARTMENT OF JUSTICE**

Defendant

Case No. 4:20-cv-447-ALM

DECLARATION OF TY CLEVINGER

My name is Ty Clevenger, I am greater than 18 years of age and competent to testify, and I do testify as follows under penalty of perjury under the laws of the United States, as witnessed by my signature below:

- (1) I am the attorney representing Brian Huddleston in the case identified above.
- (2) The information in my January 12, 2024 declaration (Dkt. #143-1) is true and correct, as is the information in my February 2, 2023 declaration (Dkt. #96-1) and my April 25, 2022 declaration (Dkt. #52-1).
- (3) Since January 12, 2024 I have accrued another \$23,700 in fees while representing Mr. Huddleston, plus \$8.95 in expenses. A true and correct invoice reflecting those fees and costs is attached to this declaration.
- (4) I believe \$500 per hour is a reasonable rate given my level of experience, and I believe \$188,011.51 is a reasonable charge for my total services thus far.

THE DECLARANT SAYS NOTHING FURTHER.

July 8, 2024


Ty Clevenger

Ty Clevenger
 212 S. Oxford Street #7D
 Brooklyn, New York 11219
tyclevenger@yahoo.com

INVOICE

July 8, 2024

Date	Time	Expense	Purpose
		\$164,302.56	Prior unpaid invoices
1/26/2024	0.9		Review opposition to fees; draft response
1/27/2024	2.3		Review discovery & past filings; legal research; draft response ISO fees
2/1/2024		8.95	Mail hard copies to chambers
2/8/2024	0.6		Review new MSJ and supporting declaration
2/14/2024	2.1		Review record; legal research; draft motion regarding ex parte
2/22/2024	2.2		Legal research on response to MSJ; email R. Stone lawyers about evidence
2/23/2024	6.1		Legal research on response to MSJ; review declarations; work on MSJ response; research counter MSJ; email J. Gillingham
2/26/2024	1		Review record; prepare for MSJ response
2/27/2024	0.5		Draft and file motion for extension
2/28/2024	1.8		Finish and file motion for extension; review response re ex parte and draft reply
3/2/2024	1.7		Legal research; Draft reply ISO motion regarding ex parte; research response to MSJ
3/3/2024	0.8		Draft reply ISO motion regarding ex parte
3/4/2024	1		Finish and file ex parte motion
3/5/2024	1.8		Legal research; draft response to MSJ
3/6/2024	2.1		Draft response to MSJ
3/7/2024	8.5		Review record; finish and file response to MSJ
3/21/2024	2		Legal research; draft surreply to MSJ
4/1/2024	3.7		Legal research; draft surreply to MSJ
4/2/2024	1.8		Legal research; draft surreply to MSJ
4/4/2024	5.5		Legal research; draft and file surreply to MSJ; motion for extension of page limit
6/28/2024	0.3		Arrange substitution; confer w/ J. Gillingham
7/1/2024	0.1		Confer w/ J. Gillingham
7/4/2024	0.4		Westlaw research on substitution; draft motion
7/5/2024	0.2		Finish and file motion to substitute

Total		\$164,311.51
	47.4 hrs. x	
	500 / hr =	<u>\$23,700.00</u>
Grand Total		\$188,011.51